

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF IOWA**

In re:

MERCY HOSPITAL, IOWA CITY, IOWA, *et al.*,¹

Debtors.

)
) Chapter 11
)
) Case No. 23-00623 (TJC)
)
) (Jointly Administered)
)

**NOTICE OF PROPOSED STIPULATED ORDER
ADJOURNING PRELIMINARY HEARING ON
MOTION OF IOWA CITY AMBULATORY SURGICAL CENTER, LLC
FOR ENTRY OF AN ORDER GRANTING RELIEF FROM THE AUTOMATIC STAY
TO PURCHASE UNITS AS A RESULT OF A PERMISSIVE REDEMPTION EVENT**

PLEASE TAKE NOTICE that, on August 8, 2025, Iowa City Ambulatory Surgical Center, LLC (“ICASC”), through counsel, filed its *Motion of Iowa City Ambulatory Surgical Center, LLC for Entry of an Order Granting Relief from the Automatic Stay to Purchase Units as a Result of a Permissive Redemption Event* [Docket No. 2047] (the “Stay Relief Motion”).

PLEASE TAKE FURTHER NOTICE that on August 19, 2025, the Liquidation Trustee, through counsel, filed its *Response to Motion to Lift Stay* [Docket No. 2055] (the “Response”).

PLEASE TAKE FURTHER NOTICE that, pursuant to Rule 4001-1(f) of the Local Rules of Bankruptcy Practice and Procedure for the U.S. Bankruptcy Court of the Northern District of Iowa, the filing of the Stay Relief Motion and the Response results in the scheduling of a preliminary hearing at which, among other things, the Court and the parties will discuss the issues, the time needed for the final hearing, and set the final hearing date. The Court has set the preliminary hearing on the Stay Relief Motion (the “Preliminary Hearing”) to occur on Friday, September 5, 2025 at 2:00 PM.

PLEASE TAKE FURTHER NOTICE that counsels to ICASC and the Liquidation Trustee have engaged in conversations regarding the Stay Relief Motion and other issues among the parties and have mutually agreed that there may be benefit in some additional time for the parties to continue these conversations to determine if a consensual resolution of all issues between the parties could be reached and that holding the Preliminary Hearing prior to the parties making that determination may be premature and not be the best use of the Court’s time.

PLEASE TAKE FURTHER NOTICE that ICASC and the Liquidation Trustee have agreed to the proposed stipulated order attached hereto as **Exhibit A** adjourning the Preliminary

¹ The Debtors include Mercy Hospital, Iowa City, Iowa (Case No. 23-00623), Mercy City, ACO, LLC (Case No. 23-00622), and Mercy Services Iowa City, Inc. (Case No. 23-00624).

Hearing until Friday, September 12, 2025 or as soon thereafter as is convenient for the Court (the "Proposed Order").

PLEASE TAKE FURTHER NOTICE that ICASC and the Liquidation Trustee respectfully request that the Court enter the Proposed Order adjourning the Preliminary Hearing and further respectfully request that the Court reset the Preliminary hearing for Friday, September 12, 2025 or as soon thereafter as is convenient for the Court.

Dated: September 4, 2025

/s/ Michael T. Gustafson

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*Counsel to Iowa City Ambulatory Surgical
Center, LLC*

Certificate of Service

The undersigned certifies, under penalty of perjury, that on this 4th day of September 4, 2025, the foregoing document was electronically filed with the Clerk of Bankruptcy Court using the Northern District of Iowa CM/ECF and the document was served electronically through the CM/ECF system to the parties of this case.

Executed: September 4, 2025

/s/ Michael T. Gustfson
Partner, Faegre Drinker LLP